

1. Thank you for the opportunity to comment on Broadcast Flags. The impact of any FCC decision will have global impact and should be studied in depth.

2. The proponents of Broadcast Flags tell us that all digital broadcasts need to be protected. I would like to make a distinction between music, TV, and film. I believe that these are three distinct experiences and require three distinct policies. The following arguments pertain to TV only. I will defer arguments on music and film for a future time.

3. I strongly believe that all efforts to curtail TV recording are a waste of time. As humans, we prefer our TV entertainment and information presented as a live communal experience. The last episode of Seinfeld may have been a big thing on the original day of broadcast, but its value depreciated rapidly after that. I believe it dumb to worry that some lone copy of the show is flying through the internet to be viewed by a lone soul out in Wyoming. I would advise that those wishing to collect money on person-to-person distribution get over it and consider being charitable. That individual in Wyoming would probably prefer to see it re-broadcast on their local channel 12 and laugh and talk about it with their neighbours.

4. To prevent abuse of the freedom to record and distribute, I would agree that if there is a seller and a buyer, and hence a contractual agreement, that the seller has the responsibility to pay copyright fees.

5. More effort should instead go to maintaining/improving live TV revenue and this could include resolving the problem of short-shifting to knock out commercials. But even here, I believe that broadcast flags have nothing to contribute. From an engineering perspective, anything broadcast cannot be regulated or controlled, as there is no inherent feedback.

6. I am intrigued by a particular pay-model being discussed online, specifically : view-the-soccer-game(no-ball) and buy-the-ball. I personally would like to see the FCC move to a hybrid broadcast/telecom model. Broadcast would be used for the high data portion (free part) and IP communications is used for the low data portion (critical, secure, payed part). In this context, the soccer example becomes : a multi-camera wide-screen HDTV MPEG-interactive soccer game via broadcast, and then you get and "pay for the ball" via telecom. That's one way to ensure revenue in the event that people short-shift out commercials. Another way to ensure revenue accrues would be to ensure that people are watching commercials,.. again maybe IP communications will automatically award \$10,000 prizes to random viewers who sit through or click on a commercial. Ahh, the beauty of full control.

7. As background, I am an engineer, I have studied in the U.S., and I have written on ethics and responsibility in U.S. Broadcasting. Also note, I personally record TV on a PC since 14 months. Most of the time, I jump past recorded commercials. I would probably use time shifting if I had a more powerful PC. With limited time to watch TV and with the novelty of PC-recording falling off, there is only nominal recording and there is a strong preference for channel surfing and live viewing. The address given is a former address (apt # withheld) as the automated system will not accept my current address.

Thank you.

Peter Hermanovic

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Filing
<PROCEEDING> 02-231
<DATE>

11/24/02
<NAME>

Peter Hermanovic
<ADDRESS1> 5421 N. East River

Rd.
<ADDRESS2>

<CITY> Chicago
<STATE> IL
<ZIP>

60656
<LAW-FIRM>
<ATTORNEY>

<FILE-NUMBER>
<DOCUMENT-TYPE>

CO
<PHONE-NUMBER>

514-842-6842
<DESCRIPTION> Broadcast Flags - Ethics,

Responsibility,

Common Sense, and Charity
<CONTACT-EMAIL>

message4pete@sympatico.ca
<TEXT>
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